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15 STATE FARM GENERAL INSURANCE COMPANY

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA

18 DEBRA COHEN TUDOR,

CASE NO. 3:22-cv-01113-RFL

19 Plaintiff,

**STIPULATION AND [PROPOSED] ORDER  
TO MODIFY THE SCHEDULING ORDER**

20 vs.

21 STATE FARM GENERAL INSURANCE  
COMPANY, an Illinois corporation; and  
22 DOES 1 through 50, inclusive,

23 Defendants.

25 Plaintiff Debra Cohen Tudor and defendant State Farm General Insurance Company (the  
26 “Parties”) submit the following stipulation to revise the court’s scheduling order.

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## **RECITALS**

1. WHEREAS, fact discovery in this matter is currently scheduled to close on October 13, 2025, with trial set for April 13, 2026;
  2. WHEREAS, to date there has been no protective order in place in this matter; Ms. Tudor and State Farm General Insurance Company (“State Farm”) have negotiated extensively for several months over the terms of a protective order but have not reached agreement;
  3. WHEREAS, discovery related to information that would be subject to the protective order has not proceeded for the last few months because of the inability of the parties to agree on a protective order. This discovery includes institutional documents that State Farm considers proprietary and confidential and multiple related 30(b)(6) depositions. The protective order dispute is now before Judge Kang (Dkt. No. 55).
  4. WHEREAS, in July 2025 the Court granted the parties’ stipulation and proposed order to partially modify the Scheduling Order based in part on medical issues preventing two State Farm witnesses from attending a deposition (Dkt. No. 54.) State Farm advises that one of those witnesses has recovered sufficiently to attend a deposition and that the other remains under ongoing medical treatment that will prevent him from attending a deposition until at least December 2025.
  5. WHEREAS, the parties agree that the Court’s scheduling Order needs to be adjusted. The proposed dates below reflect a months-long acknowledgment between the parties that the duration of the protective order negotiations and dispute shall not impair either party’s discovery opportunities.
  6. WHEREAS, the Court graciously agreed to modify the Scheduling Order on January 24, 2023 (Dkt. No. 25), on August 22, 2023 (Dkt. No. 27), on May 15, 2024 (Dkt. No. 35), on April 1, 2025 (Dkt. No. 48, at which time the Court stated that it did not anticipate granting any further extensions absent extraordinary circumstances), on July 2, 2025 (Dkt. No. 51), and on July 25, 2025 (Dkt. No. 54). The Parties respectfully submit that the instant request reflects extraordinary circumstances and good cause for adjusting the schedule further at this time.

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2                   **II.**  
3                   **STIPULATION**

4                   The Parties hereby stipulate to the following revisions to the court's Scheduling Order:

- |   |   |
|---|---|
| 5                   1.     Fact discovery cutoff:     | February 24, 2026<br>(currently October 13, 2025) |
| 6                   2.     Initial Expert Reports:    | March 11, 2026<br>(currently October 29, 2025)    |
| 7                   3.     Rebuttal Expert Reports:   | April 3, 2026<br>(currently November 21, 2025)    |
| 8                   4.     Dispositive Motions due:   | April 24, 2026<br>(currently December 12, 2025)   |
| 9                   5.     Close of Expert Discovery: | May 29, 2026<br>(currently January 16, 2026)      |
| 10                  6.     Dispositive Motion Hearing | June 2, 2026<br>(currently January 20, 2026)      |
| 11                  7.     Pretrial Conference        | July 28, 2026<br>(currently March 17, 2026)       |
| 12                  8.     Jury Selection/Jury Trial  | August 24, 2026<br>(currently April 31, 2026)     |

13                  Dated: October 10, 2025

14                  BMCA LAW GROUP, A P.C.

15                  By \_\_\_\_\_ */S/ Bruce M. Cohen*  
 16                  BRUCE M. COHEN  
 17                  JULIA MACHAI COHEN  
 18                  Attorneys for Plaintiff  
 19                  DEBRA COHEN TUDOR

20                  Dated: October 10, 2025

21                  HAYES SCOTT BONINO  
 22                  ELLINGSON & GUSLANI LLP

23                  By \_\_\_\_\_ */S/ Stephen P. Ellingson*  
 24                  STEPHEN M. HAYES  
 25                  STEPHEN P. ELLINGSON  
 26                  JAMIE A. RADACK  
 27                  Attorneys for Defendant  
 28                  STATE FARM GENERAL INSURANCE COMPANY

1 [PROPOSED] ORDER

2 IT IS SO ORDERED.

3 Pursuant to the Parties' stipulation, the Scheduling Order is modified as follows:

- 4 1. Fact discovery cutoff: February 24, 2026  
(currently October 13, 2025)
- 5 2. Initial Expert Reports: March 11, 2026  
(currently October 29, 2025)
- 6 3. Rebuttal Expert Reports: April 3, 2026  
(currently November 21, 2025)
- 7 4. Dispositive Motions due April 24, 2026  
(currently December 12, 2025)
- 8 5. Close of Expert Discovery: May 29, 2026  
(currently January 16, 2026)
- 9 6. Dispositive Motion Hearing June 2, 2026  
(currently January 20, 2026)
- 10 7. Pretrial Conference July 28, 2026  
(currently March 17, 2026)
- 11 8. Jury Selection/Jury Trial August 24, 2026  
(currently April 31, 2026)

12 Dated: \_\_\_\_\_, 2025

13 \_\_\_\_\_  
14 HONORABLE RITA F. LIN  
15 UNITED STATES DISTRICT COURT JUDGE  
16 FOR THE NORTHERN DISTRICT OF  
17 CALIFORNIA